

Darwin E. Farrar (SBN 152735)
Chief Counsel
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Tel: 415-703-1599
Email: darwin.farrar@cpuc.ca.gov;

And

Alisa C. Lacey (AZ 010571) (Pro Hac Vice)
Robert T. Kugler (MN0194116)
Thomas J. Salerno (AZ 007492) (Pro Hac Vice)
Anthony P. Cali (AZ 028261) (Pro Hac Vice)

Stinson LLP
1850 N. Central Ave., #2100
Phoenix, AZ 85004
Tel: 602-279-1600
Fax: 602-240-6925
Email: alisa.lacey@stinson.com
Email: robert.kugler@stinson.com
Email: thomas.salerno@stinson.com
Email: anthony.cali@stinson.com

Attorneys for the Public Advocates Office

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E Corporation

and

Pacific Gas and Electric Company,

Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**THE PUBLIC ADVOCATES OFFICE'S
STATEMENT OF POSITION RE:**

**MOTION OF THE AD HOC
COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS TO
TERMINATE THE DEBTORS'
EXCLUSIVE PERIODS [DE 2741]**

1 ☐ Affects PG&E Corporation
2 ☐ Affects Pacific Gas and Electric
3 Company
4 ☒ All Debtors

5 **All papers shall be filed in the Lead
6 Case,
7 No. 19-30088 (DM)*

Hearing Date: July 24, 2019
Hearing Time: 9:30 a.m.
Place: Courtroom 17

8 The Public Advocates Office at the California Public Utilities Commission ("**Cal**
9 **Advocates**") states its position with respect to the Motion of the Ad Hoc Committee of
10 Senior Unsecured Noteholders to Terminate the Debtors' Exclusive Periods Pursuant to
11 Section 1121(d)(1) of the Bankruptcy Code ("the **Motion**") [DE 2741] as follows:

12 1. Cal Advocates asserts that the Court should terminate the Debtors' exclusivity
13 periods for filing and seeking acceptances of a plan of reorganization with respect to *all*
14 *parties*. (The proposed order submitted as Exhibit A to the Motion would limit
15 termination to only the movant, not all parties.) Cal Advocates asserts that competing
16 plans are in the best interests of all parties in interest in this case.

17 2. At this date, Cal Advocates does not possess adequate information, and
18 therefore, expresses no opinion or support for the Term Sheet attached to the Motion as
19 Exhibit B.

20 Dated: July 16, 2019.

PUBLIC ADVOCATES OFFICE

By:

Darwin E. Farrar (SBN 152735)
Chief Counsel, Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Tel: 415-703-1599
Email: darwin.farrar@cpuc.ca.gov;

And

STINSON LLP

/s/ Alisa C. Lacey

Alisa C. Lacey
Robert T. Kugler
Thomas J. Salerno

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Anthony P. Cali
1850 N. Central Ave., #2100
Phoenix, AZ 85004
Tel: 602-279-1600
Fax: 602-240-6925
Email: alisa.lacey@stinson.com
Email: robert.kugler@stinson.com
Email: thomas.salerno@stinson.com
Email: anthony.cali@stinson.com

Attorneys for the Public Advocates Office